

SEP-02-2003 13:43 SEP-02-2003 13:43
Tucker, Cheryl

From: Snedegar, Michael
Sent: Thursday, December 20, 2001 12:50 PM
To: Tucker, Cheryl
Subject: NPRM - Digestive Listings - Virginia Response

Other than the concern for a continuing trend in revised Listings of requiring 6 months rather than 3 months of medical findings prior to many decisions, the Virginia DDS only has the following 2 comments.

Listing 5.02 for recurrent gastrointestinal hemorrhage indicates occurrence of three times during a 6-month period and goes on to say that "All incidents within a consecutive 14-day period constitute one episode." This seems to be in conflict with the information provided in the preface (5.00 C2), where we are told there must be at least one month between events. It would seem that all incidents within a 30-day period would constitute one episode for recurrent gastrointestinal hemorrhage, rather than the stated 14 days.

In the child listings the guidelines for what is needed to document malnutrition should be included in listing 105.08. These are given in 105.00F but there is not even a cross-reference to this in the listing.